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State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

July 1, 2015

John Spencer
Simplot Phosphates, LLC
9401 North Highway 191
Vernal, Utah 84078-7802

Subject: Initial Review of Tailings Storage Facility Amendment, Simplot Phosphates LLC, Vernal Phosphate Mine, M/047/0007, Uintah County, Utah

Dear Mr. Spencer:

Thank you for submitting an updated mining and reclamation plan for the tailings storage facility. The Division of Oil, Gas and Mining has reviewed the modifications which were received June 1, 2015. The submittal has a few corrections and deficiencies that need to be made prior to approving this amendment.

The comments are listed under the applicable Minerals Rule heading; please format your response in a similar fashion. Please address only those items requested in the attached technical review by sending replacement pages using **redline and strikeout** text. After the amendment is determined technically complete, the Division will ask that you submit two clean copies of the complete and corrected amendment. Upon final approval, both copies will be stamped approved, and one will be returned for your records.

The Division will suspend further review pending receipt of your response. Please contact April Abate at 801-538-5214 or me at 801-538-5261 if you have questions about the comments or if you would like to arrange a meeting to discuss them. Thank you for your cooperation in completing this permitting action.

Sincerely,

Paul B. Baker
Minerals Program Manager

PBB: aa: eb
Attachment: Review
p:\groups\minerals\wp\m047-uintah\m0470007-simplot\final\rev-6655-07012015.docx



INITIAL REVIEW OF NOTICE OF INTENTION TO COMMENCE LARGE MINING OPERATIONS

Simplot Phosphates, LLC
Vernal Phosphate Mine
M/047/0007
July 1, 2015

General Comments:

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
1	General	The Division may have additional comments based on the responses to the issues raised in this review.	aa	
2	Page 3a	The life of mine estimate shows the year 2043, but it is written as 2,043. Please correct this typo.	aa	
3	Section 3B	The Raise 2 embankment elevation is documented as 5,985 amsl. The text states that the next level—the Raise 3 embankment—will be at an elevation of 5,600 feet, lower than the Raise 2 level. Cross section maps show the Raise 3 level at an elevation of 6,000 amsl. Please correct this discrepancy in the text.	aa	
4	Section 3B Page 4a	The text refers to an alternative site proposed for tailings known as the “B” site. The “B” site could not be located on any page in Appendix L or in the main NOI document.	aa	
5	Section 3B page 4a	Please remove the last paragraph stating that the TSF expansion will be submitted as a significant revision. The TSF has already been approved and this submittal represents an amendment update.	aa	

R647-4-106 - Operation Plan

106.2 - Type of operations - mining method, onsite processing, deleterious or acid-forming materials

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
6	NOI 106.2	Section 106.2 in the NOI will need to be edited to include a reference to Appendix L which contains the TSF detail information. Currently, the NOI summarizes the TSF facility, but there is no reference pointing to the information in Appendix L.	aa	

106.7 - Existing vegetation - species and amount

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
7	Sec. 6H	The operator provided a vegetation test plot map showing the types of species that are being tested for reclamation success but indicated that no data was available other than visual observations. The Division needs additional data to evaluate which species are successful and which are not. Please provide a vegetation monitoring report by October 31, 2015.	aa/lk	

R647-4-110 - Reclamation Plan

110.2 – Reclamation of roads, highwalls, slopes, impoundments, drainages, pits, piles, shafts, adits, etc

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
8	NOI 110.2	Section 110.2 of the NOI under “Impoundments” contains a reference that reclamation of the TSF will be done in accordance with the March 2000 plan. This reference needs to be updated and refer to the information contained in Appendix L.	aa	

R647-4-112 - Variance (List all variances requested and make a finding if approving.)

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
9	Sec. 7C	(No response required.) A variance was granted in 2000 when the initial tailings expansion amendment was submitted. The variance requested that 16,500 cubic yards of salvageable topsoil that was identified in the permit area not be used in reclamation of the tailings dumps. The topsoil from these various locations is found in areas which would require the creation of access roads that would cross BLM lands, which could trigger an Environmental Assessment evaluation. Furthermore, the total amount of topsoil that would be available for redistribution on the tailings would only amount to 0.25 inch depth. Although there was no request associated with this permitting action for the Division to review the variance, the Division reevaluated the variance and found that the previous decision on granting the variance should continue to be upheld.	aa/lk	

R647-4-113 – Surety

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
10	46a	The information submitted in the bonding calculation worksheet will need to be merged with the master bonding calculations located in Appendix M.	aa	
11	46a	Please include worksheets to show the productivity for reclaiming the tailing ponds. The worksheets are on the Division’s webpage and are similar to those in the approved NOI. Footnote #3 says to see the productivity spreadsheets, but they were not included for this operation.	whw	
12	46a	Please include the costs on the summary sheet.	whw	